

November 7, 2022

Hon. Donna M. Ryu, Magistrate Judge (N.D. Cal.)

Re: *Google, LLC v. Sonos, Inc.*; Case No. 3:20-cv-06754-WHA (DMR) (N.D. Cal.)

Dear Judge Ryu:

Google LLC (“Google”) and Sonos, Inc. (“Sonos”) respectfully submit this joint letter response to the Court’s Order on Pending Joint Discovery Letters (Dkt. 392) (“Order”). In the Order, the Court denied without prejudice the parties’ joint discovery letters noting a “number of the disputes raised in the joint letters appear to be moot because the parties have agreed to supplement certain discovery responses.” Dkt. 392. The Court ordered the parties to meet and confer and submit a new joint letter by November 7, 2022. The parties have conferred over Zoom, most recently on November 4, 2022¹.

Sonos’s letter (Dkt. 378) sought an order compelling designation of additional Rule 30(b)(6) designees and a supplemental response to Sonos’s Interrogatory Nos. 14 and 15. Google has since supplemented its response to Sonos’s Interrogatory No. 15. **Accordingly, Sonos hereby renews its request concerning the Rule 30(b)(6) designees and Interrogatory No. 14 for the same reasons articulated in the joint letter (Dkt. 378).** Those issues are presently ripe for adjudication.

Google’s letter (Dkt. 381) sought an order compelling Sonos to supplement its responses to Google’s Interrogatory Nos. 11, 13, and 18 and produce additional documents pursuant to RFP No. 58. Sonos has agreed to supplement its responses and production to these interrogatories and RFP and expects to complete the same by November 8, 2022. **While Sonos expects that its supplementation and production will moot the entirety of the dispute, in order to allow Google time to evaluate the supplementation and production and to, if necessary, renew its request to compel supplementation and production, Google respectfully requests that the Court extend the deadline to resubmit disputes remaining from its joint letter (Dkt. 381) to November 10, 2022. Should the Court be inclined to reject this extension request, Google renews its request regarding all of the issues in its previous letter.**

DATED: November 7, 2022

QUINN EMANUEL URQUHART & SULLIVAN, LLP

By /s/ Charles K. Verhoeven

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¹ The relevant case management deadlines include: the deadline for bringing all discovery motions or extension motions based on discovery violations (October 16, 2022); close of non-expert discovery (November 30, 2022); close of expert discovery (January 4, 2023); deadline to file dispositive motions (January 26, 2023); pretrial conference (May 3, 2023); and trial (May 10, 2023).

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By /s/ Clement S. Roberts
Clement S. Roberts

Attorneys for Sonos, Inc.

FILER'S ATTESTATION

I, Clement S. Roberts, pursuant to Civil Local Rule 5-1(h)(3), attest that all other Signatories listed, and on whose behalf the filing is submitted, have concurred in the filing of the document.

Dated: November 7, 2022

/s/ Clement S. Roberts
Clement S. Roberts